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3 Nevada State Bar No. 11479
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6 Attorney for
7 Linda Livolsi

8 **UNITED STATES DISTRICT COURT**
9 **DISTRICT OF NEVADA**

10 ***

11 UNITED STATES OF AMERICA,
12 Plaintiff,
13 v.
14 LINDA LIVOLSI,
15 Defendant.

16 Case No. 2:10-cr-00578-APG-GWF

EMERGENCY MOTION TO EXTEND
SELF SURRENDER DATE

(Expedited Treatment Requested)

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18 COMES NOW Rene L. Valladares, Federal Public Defender, and Monique
19 Kirtley, Assistant Federal Public Defender, counsel for LINDA LIVOLSI, files this Motion to
20 Extend Ms. Livolsi's self-surrender date for the following reasons:

21 1. In granting Ms. Livolsi's third request for an extension to her self-surrender date,
22 this Court ordered the government to file a brief explaining whether the Bureau of Prisons has
23 sufficient medical staff and facilities to quickly assess and address Ms. Livolsi's health
24 conditions when she self-surrenders. The government was ordered to file their brief by noon
25 on Monday, November 9, 2015. *See* CR #232. As of today's date, November 10, 2015, the
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1 government has failed to file their brief. Ms. Livolsi is scheduled to self-surrender by noon on
2 November 13, 2015.

3 2. Ms. Livolsi now requests another extension of her self-surrender date until the
4 government has filed their brief which this Court ordered on October 29, 2015.

5 3. This is the fourth request to extend the self-surrender date.

6 Respectfully submitted, this 10th day of November, 2015

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8 RENE L. VALLADARES
9 Federal Public Defender

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11 By: /s/Monique Kirtley
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13 MONIQUE KIRTLEY
14 Assistant Federal Public Defender
15 Attorney for LINDA LIVOLSI
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CERTIFICATE OF ELECTRONIC SERVICE
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3 The undersigned hereby certifies that she is an employee of the Federal Public Defender
4 for the District of Nevada and is a person of such age and discretion as to be competent to serve
5 papers.

6 That on November 10, 2015, she served an electronic copy of the above and foregoing
7 **EMERGENCY MOTION TO EXTEND SELF SURRENDER DATE** (Expedited
Treatment Requested) by electronic service (ECF) to the person named below:
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10 DANIEL G. BOGDEN
United States Attorney
11 J. GREGORY DAMM
Assistant United States Attorney
333 Las Vegas Blvd. So. 5th Floor
12 Las Vegas, NV 89101

13 */s/Nancy Vasquez, Legal Assistant*
14 Employee of the Federal Public Defender
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